

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF VERMONT

UNITED STATES OF AMERICA, )  
                                  )  
                                  )  
                                  )      Case No. 2:16-cr-00154-wks-1  
                                  )  
                                  )  
v.                                  )  
                                  )  
                                  )  
JAMES COYNE,                  )  
Defendant.                      )

**DEFENDANT'S MOTION**  
**TO EXTEND TIME TO FILE REPLY MOTION**

NOW COMES Defendant James Coyne, through counsel, and respectfully requests that the Court extend the time for filing his reply to the government's motion in opposition to the defendant's suppression motion. The current deadline for the defense's reply motion is July 14, 2017. Mr. Coyne requests that the Court extend the filing date for his reply to thirty (30) days after the current deadline.

Mr. Coyne is charged in a one count indictment of violating 18 U.S.C. §§ 2253(a)(4)(B) and 2252(b)(2), knowingly possessing at least one matter containing visual depictions of minors engaging in sexually explicit conduct. The defense filed a Motion to Suppress Evidence and Statements on May 17, 2017, and the government filed a motion in opposition to the defense's suppression motion on June 30, 2017.

The government's opposition motion is thirty pages 30 pages in length and contains complex facts and novel legal issues. Also, there were seven exhibits filed with the motion that contain several hundred additional pages of documents. The defense intends to file a reply motion in response to the government's opposition; however, counsel first requires additional time to thoroughly review the materials contained in the government's exhibits and to research the legal arguments laid out in its motion.

The government, through Christina Nolan, Assistant United States Attorney, does not oppose the defense's motion to extend the filing date of its reply.

WHEREFORE, for the reasons stated above, Mr. Coyne respectfully requests that the Court grant his motion for an extension of time for filing his reply motion, and that the Court set the new date for the filing of the defense's reply no sooner than thirty (30) days from the signing of this Order, or as soon thereafter as the Court may find practicable.

Dated: July 14, 2017.

MICHAEL L. DESAUTELS  
Federal Public Defender

By: /s/ Steven L. Barth  
Steven L. Barth  
Assistant Federal Public Defender  
Office of the Federal Public Defender  
126 College Street, Suite 410  
Burlington, Vermont 05401  
(802) 862-6990  
Counsel for James Coyne

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF VERMONT

UNITED STATES OF AMERICA, )  
                                  )  
                                  )  
v.                              )         Case No. 2:16-cr-00154-wks-1  
                                  )  
                                  )  
JAMES COYNE,              )  
Defendant.                  )

CERTIFICATE OF SERVICE

I hereby certify that on the 14th day of July, 2017, I electronically filed the Defendant's Motion to Extend Time to File Response Motion with the Clerk of Court using the CM/ECF system, which will send notification of such filing(s) to Christina Nolan, Assistant United States Attorney, at christina.nolan@usdoj.gov.

By:    */s/ Marsha V. Curtis*  
          MARSHA V. CURTIS  
          Paralegal

Office of the Federal Public Defender  
District of Vermont  
126 College Street, Suite 410  
Burlington, Vermont 05401  
(802) 862-6990